ECCV Submission  
To  
Australian Government  
Department of Immigration and Border Protection  
On  
Strengthening the test for Australian Citizenship  
June 2017

The Ethnic Communities’ Council of Victoria Inc. (ECCV) is the voice of multicultural Victoria and the peak policy advocacy body for eight regional ethnic community councils and up to 220 members including ethnic and multicultural organisations across Victoria since 1974. For over 40 years, we have been the link between multicultural communities, government and the wider community. ECCV has a strong history in advocating for the rights of Victoria’s multicultural communities.

We aim for a culturally diverse and harmonious society that is just, fair and inclusive where all people have the opportunity to participate in and contribute to community life. We advocate for freedom, respect, equality and dignity for multicultural communities and strive with others, to build a strong, vibrant Victorian community.

ECCV welcomes the opportunity to provide feedback on the proposed changes to Strengthening the test for Australian citizenship to the Department of Immigration and Border Protection.

This submission is informed by community consultation, desk top review on issues relating to, but not confined to, strengthening multiculturalism, migration and settlement and social cohesion.

ECCV consultation found that migrants value their Australian citizenship and feel that attaining Australian citizenship is the pinnacle of achieving belonging. They look forward to singing ‘Advance Australia Fair’ and celebrating events that Australians hold dear such as ANZAC Day. The value of Australian citizenship is further demonstrated by the high take rate up and a perception that Australia is a place of opportunity, safety and truly the ‘lucky country’. ECCV consultations however found that putting up yet more hurdles to attaining Australian citizenship may marginalise and disadvantage the most vulnerable in our community.

ECCV would like to respond to the following reforms as outlined in the Strengthening the test for Australian Citizenship Terms of Reference:

**Increasing the general residence requirement**

ECCV consultation found that extending the length of stay requirement of applicants to four years minimum permanent residency prior to being permitted to apply for citizenship impacted on the migrants’ feeling’s of stability and ability to plan for their future. This leaves them with a sense of
feeling ‘in limbo’. The protracted visa application process to become a permanent resident, move from one visa status to another can be a lengthy and costly process. This process impacts on an individual’s sense of certainty, belonging and their ability to access services even though they are contributing to Australian society through their employment:

‘...this does not stop me from feeling that this change of [residency] requirements does not help the collective subconscious of the community of people who feel they are genuinely ready to be called Australians...after working hard for many years and paying their tax and helping the country grow.’

Recommendation 1:

ECCV recommends that the permanent residency period should remain at its current length of total four years’ residency with 12 months’ permanent residency to qualify for application for Australian citizenship.

Introducing an English language test

ECCV believes that that English language proficiency plays a significant role in enabling social, civic and economic participation in Australia.

Whilst ECCV supports strong measures to assist citizenship applicants who are learning English, we assert that there are significant barriers to attaining English language proficiency which must be considered by government prior to enforcing this measure. ECCV research has shown that the difficulty or lack of ability to develop English language proficiency does not demonstrate a lack of commitment of new migrants to Australian values and the Australian way of life.

Further, new arrivals to Australia are afforded 510 hours of English language lessons under the Adult Migrant Education Program (AMEP). The AMEP provides support to develop a ‘functional’ level of English language proficiency whereas the citizenship test requires the applicant to have ‘competent’ language proficiency levels. Developing language competency is expensive making this a significant barrier for newly arrived migrants and refugees.

Competent English language skill is demonstrated by achieving International English Language Testing System (IELTS) Band 6 level in English language proficiency. The IELTS test is expensive and has multiple components including reading, writing, listening and speaking.

In addition, ECCV consultation with migrant women showed that they felt there was a bias in the IELTS. They believe that their accent negatively impacted on their test outcome forcing them resit multiple times. This finding confirms evidence presented at the UNAA Economic Empowerment of Women and Girls Forum 2016.

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1 ECCV Consultation community member response.
ECCV raises the following concerns with IELTS Band 6 requirement:

1. **High English language proficiency and literacy can be difficult to attain for vulnerable migrant and refugee cohorts:**
Migrant and refugees with disrupted migration journeys may not have literacy in their first language (to build language capability on) are particularly disadvantaged.

It is well recognised that language literacy is difficult to develop if it was not already acquired in an individual’s childhood years. This particularly impacts on refugees who have experienced significant and prolonged displacement and who have had little opportunity to develop literacy skills in their first language.

2. **Language competency takes time and resources:**
The US Department of State’s Foreign Service Institute (FSI) states that developing English language proficiency can be more complicated depending on the similarity of the language to English. The data is based on the ability of native English language speakers with ‘good aptitude for formal language study, plus knowledge of several other languages’. Languages which are deemed as closely related to English include Dutch, French, Italian, Norwegian require 575 to 600 class hours of study. The schedule of study ‘calls for 25 hours of class per week with 3-4 hours per day of self - directed study’. Conversely, languages deemed significantly exceptionally difficult for native English speakers to learn require 2200 class hours of study in addition to the recommended self – directed study time. Languages which fall into this category include Arabic, Mandarin and Cantonese.

ECCV believes that the current AMEP program therefore needs to be extended to enable sufficient English language competency development for all culturally diverse groups. A further targeted extension of AMEP may help to address the needs of migrants who speak languages which are significantly different from English.

3. **Competing demands of settlement needs and language learning requirement:**
Migrants and refugees are faced with complex demands of immediate settlement needs such as: getting a job; finding a place to live; attending to their mental and physical health (including injuries related to torture and trauma) and dealing with the concerns for the safety and welfare of family members and friends who may have been left behind in dangerous conflict zones.

These concerns may impinge on the ability and availability of resources for people to focus on learning a new language.

ECCV believes that additional support services need to be put in place to assist vulnerable migrants and refugees to settle well so that they are able to establish themselves successfully locally. ECCV

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4 Ibid 3
consultation with humanitarian entrants has identified that lack of housing places significant pressure on families. Migrant female headed households are particularly at risk of accepting poor standard of living conditions or risk homelessness placing themselves and their children at risk. These circumstances force migrants and refugees to prioritise their immediate safety needs.

4. **The English language proficiency of adult migrants is not an indicator of their commitment to Australia or Australian values:**

Studies conducted on the commitment to education of refugee families found that the children of these families had a very high commitment to education. They were more likely to remain in education than third generation Australians and second generation Australians of English speaking backgrounds (Khoo et al in Refugee Council of Australia 2010). Further, this research indicated that children of adult refugees who had the lowest level of English language proficiency were also most likely to be enrolled in education and have tertiary education and higher involvement in managerial and professional work.

This evidence demonstrates that the experience of language barriers has the effect of reinforcing parental commitment to investing in their Australian born children’s education.

In these instances, ECCV believes that high English language proficiency is not necessarily a demonstration of the commitment of the migrant to the new country and has the potential to disadvantage people who are most in need of citizenship. Similarly, limiting the number of times an applicant can take the citizenship test to three is an additional arbitrary barrier which does not acknowledge the commitment, persistence and value applicants place on attaining Australian citizenship.

**Recommendation 2:**

ECCV recommends that government undertake greater research and wider consultations with the Australian community, particularly with culturally diverse communities, educators and language specialists prior to introducing changes to the language test.

**Recommendation 3:**

ECCV recommends a stepped funding model approach to AMEP which takes into consideration the learning needs of migrants with no literacy in their first language and language groups which are significantly different to English.

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6 Ibid 5
Strengthening the Australian Values Statement

ECCV supports the general nature of the values articulated in the government’s *Strengthening the Test for Australian Citizenship* document.

ECCV, however, notes that these values are not tested on Australians by descent to maintain their citizenship, nor are they required to know the pledge or sign up to its common values. Equally, the Australian citizenship test requires a higher level of knowledge of civics of applicants than currently required to be taught in the national curriculum. ECCV acknowledges that all Education Ministers have endorsed to strengthen the national curriculum with greater emphasis on civics and citizenship.

ECCV also sees the need to generally strengthen and broaden community knowledge of Australian values, like respect, freedom and equality. These shared values should be a common goal for all Australians and their application should not be limited to more recently arrived community members.

Australia has a highly cohesive society where 86 percent of Australians feel that multiculturalism is good for Australia. ECCV believes that all Australians share responsibility for promoting and living values such as inclusion, safety and harmony.

ECCV commends the government’s social cohesion initiatives, particularly the funding of community activities and events, including Harmony Week. There still needs to be greater work done in the area of racism and discrimination. For example, programs such as *Racism. It Stops with Me.* need greater exposure and depth of penetration.

**Recommendation 4:**

ECCV recommends that government drive achieving and maintaining strong social cohesion as a whole of community responsibility and provides greater resources for anti-racism initiatives such as *Racism. It Stops with Me.*

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